

MEMO ENDORSED

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

December 18, 2014

By Electronic Mail

The Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 500 Pearl Street, Room 725 New York, New York 10007

E-mail: alcarternysdchambers@nysd.uscourts.gov

Re: United States v. Trent Martin,

S1 12 Cr. 887 (ALC)

Dear Judge Carter:

At today's conference, the Court indicated its concerns with the sufficiency of the defendant's guilty plea allocution in light of the Second Circuit's recent decision in *United States* v. *Newman and Chiasson*, 13-1837, 13-1917. The Court ordered the Government to submit briefing on the issue by December 23, 2014, defense counsel to respond by December 30, 2014, and the parties to reconvene for a conference on January 7, 2015. At today's subsequent conferences for Martin's co-defendants, the Court set a different schedule for the parties to complete similar briefing. Namely, for co-defendants Conradt, Weishaus, and Payton, the Court ordered the Government to submit briefing by January 12, 2015, defense counsel to respond by January 19, 2015, and the parties to reconvene for conferences on January 23, 2015.

The Government respectfully submits that the Court adjust the briefing schedule for Martin to correspond with his co-defendants. Specifically, that the Government submit briefing by January 12, 2015, defense counsel to respond by January 19, 2015, and the Court hold a similar conference on January 23, 2015 at a time convenient to the Court. We have spoken to Martin's counsel, Larry Krantz, who consents to this request.

Thank you for your consideration of these matters.

Respectfully submitted,

PREET BHARARA United States Attorney

By: <u>//s//</u>

Jessica Masella Andrew Bauer Damian Williams

Assistant United States Attorneys (212) 637-2288/2354/2298

cc: All Counsel

(By ECF and Electronic Mail)

SO OHDERED:

HON. ANDREW L. CARTER, JR
INTED STATES DISTRICT JUDGE

12-19-12